

Renée Welze Livingston (SBN 124280)  
Crystal L. Van Der Putten (SBN 227262)  
LIVINGSTON LAW FIRM  
A Professional Corporation  
1600 South Main Street, Suite 280  
Walnut Creek, CA 94596  
Tel: (925) 952-9880  
Fax: (925) 952-9881

Attorneys for Defendant  
MASAI USA CORP.  
(Erroneously sued herein as  
MASAI USA CORPORATION)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MAVOURNEEN BROWN,

Plaintiff,

v.

MASAI USA CORPORATION, a  
corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Case No. 3:12-CV-00324-MEJ  
AMENDED

**STIPULATED REQUEST FOR ORDER  
ENLARGING TIME IN CASE  
MANAGEMENT ORDER AND  
[PROPOSED] ORDER**

Complaint Filed: January 20, 2012  
Trial Date: 09/09/13

Pursuant to Northern District of California Local Rule 6-2 defendant MASAI USA  
CORP., by and through its counsel of record and plaintiff MAVOURNEEN BROWN, plaintiff  
*in pro per*, respectfully request an Order enlarging time in the August 13, 2012 Case  
Management Order and make the following stipulation:

1. Plaintiff MAVOURNEEN BROWN filed her Complaint on January 20, 2012;
2. Defendant MASAI USA CORP. filed its Answer on April 14, 2012;
3. Plaintiff MAVOURNEEN BROWN was unable to participate in the litigation for  
a period of time because she was recovering from an April 2012 ankle surgery;
4. From approximately October 2009 to the present plaintiff MAVOURNEEN

1 BROWN has had continued and ongoing difficulties with her ankle and been intermittently  
2 unable to participate in this litigation;

3 5. From approximately December 29, 2012 through mid-January 2013 plaintiff  
4 MAVOURNEEN BROWN was very ill with the flu and unable to participate in the litigation;

5 6. Accordingly, the parties rescheduled mediation from January 11, 2013 to January  
6 29, 2013;

7 7. The new mediation date is shortly before the parties' deadline to disclose expert  
8 witnesses;

9 8. In order to allow the parties to participate in mediation and adequately prepare for  
10 trial, the parties request at least a 30-day continuation of the following dates/deadlines set forth  
11 in the August 13, 2012 Case Management Order:

12 a. Disclosure of Expert Witnesses: continued from 2/8/2013 to 3/8/2013;

13 b. Disclosure of Rebuttal Expert Witnesses: continued from 2/15/2013 to  
14 3/15/2013;

15 c. Dispositive Pretrial Motions:

16 i. All dispositive motions shall be filed, served and noticed by  
17 5/6/2013 (continued from 4/04/2013);

18 ii. All dispositive motions shall be heard on 6/10/2013 (continued  
19 from 5/09/2013);

20 d. Completion of Discovery: continued from 3/05/2013 to 4/5/2013.

21 9. The continuation of the above dates will not affect the September 9, 2013 trial  
22 date in this matter or dates and deadlines related to trial.

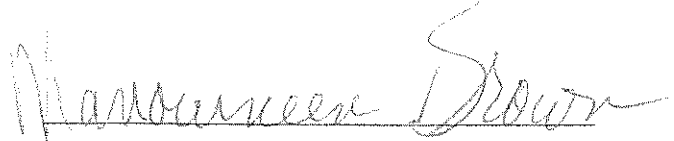
23 10. The parties were previously granted a continuance of the initial case management  
24 conference (continued from May 3, 2012 to August 23, 2012) because plaintiff was recovering  
25 from a recent ankle surgery and unable to participate in the scheduled conference or related dates  
26 and deadlines.

27 11. The parties were previously granted a continuance of the deadline to complete  
28 mediation (from November 11, 2012 to January 31, 2012) to allow the parties to meaningfully

1 participate in mediation after plaintiff was unable to participate in the litigation for a period of  
2 time preventing the parties from completing the necessary discovery in advance of mediation.

3 **IT IS SO STIPULATED.**

4  
5 Dated: January 18, 2013



6 Mavourneen Brown  
7 Pro Se Plaintiff

8  
9 Dated: January 18, 2013

LIVINGSTON LAW FIRM

10  
11 By \_\_\_\_\_

12 Renée Welze Livingston  
13 Crystal L. Van Der Putten  
14 Attorneys for Defendant  
15 MASAI USA CORP.  
16 (Erroneously sued herein as  
17 MASAI USA CORPORATION)  
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1 participate in mediation after plaintiff was unable to participate in the litigation for a period of  
2 time preventing the parties from completing the necessary discovery in advance of mediation.

3 **IT IS SO STIPULATED.**

4  
5 Dated: January 21, 2013

\_\_\_\_\_  
6 Mavourneen Brown  
7 Pro Se Plaintiff

8  
9 Dated: January 21, 2013

LIVINGSTON LAW FIRM

10  
11 By 

12 Renée Welze Livingston  
13 Crystal L. Van Der Putten  
14 Attorneys for Defendant  
15 MASAI USA CORP.  
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**ORDER MODIFYING AUGUST 13, 2012 CASE MANAGEMENT ORDER**

**IT IS HEREBY ORDERED** that the August 13, 2012 Case Management Order is modified with regard to dates as set forth below:

- Disclosure of Expert Witnesses due 3/8/2013;
- Disclosure of Rebuttal Expert Witnesses due 3/15/2013;
- Dispositive Pretrial Motions:
  - All dispositive motions shall be filed, served and noticed by 5/6/2013;
  - All dispositive motions shall be heard on ~~6/10/2013~~; 06/13/2013
- Discovery completed by 4/5/2013.

Dated: January 23, 2013

  
\_\_\_\_\_  
Honorable Maria Elena James  
UNITED STATES MAGISTRATE JUDGE

1 MAVOURNEEN BROWN  
Natural Person Appearing Pro Se.  
2 7351 Longmont Loop  
Castro Valley, CA 94552

3 Telephone: 510.581.1220  
4 Facsimile: 510.583.6265  
Mkbrown2950@gmail.com  
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7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 MAVOURNEEN BROWN,

11 Plaintiff,

12 vs.

13 MASAI USA CORPORATION, a corporation;  
14 and DOES 1 through 100,

15 Defendants.  
16  
17

No.: CV12 0324 MEJ

DECLARATION OF MAVOURNEEN BROWN  
IN SUPPORT OF STIPULATED REQUEST  
FOR ORDER ENLARGING TIME IN CASE  
MANAGEMENT ORDER

Complaint Filed: January 20, 2012  
Trial Date: September 9, 2013

Honorable Maria-Elena James

18 I, MAVOURNEEN BROWN, do hereby declare:

19 1. I am the plaintiff in the action entitled *Mavourneen Brown v. Masai USA Corp.*, Case  
20 No. 3:12-CV-00324-MEJ. The facts stated herein are of my own personal knowledge. If called as a  
21 witness, I could and would competently testify to the facts herein stated.

22 2. I was unable to participate in the litigation for a period of time in 2012 because I was  
23 recovering from an April 2012 ankle surgery.

24 3. From approximately October 2012 to the present I have had continued and ongoing  
25 difficulties with my ankle and been intermittently unable to participate in this litigation.

26 4. From approximately December 29, 2012 through mid-January 2013 I was very ill  
27 with the flu and unable to participate in the litigation.  
28

Mavourneen Brown  
MAVOURNEEN BROWN